

**UNITED STATES COURT OF APPEALS
FOR THE NINTH CIRCUIT**

Form 7. Mediation Questionnaire

Instructions for this form:

9th Cir. Case Number(s)

Case Name Porth v. Payward, Inc. et al

Counsel submitting this form Lianlian Porth /Pro se

Represented party/parties Plaintiff

Briefly describe the dispute that gave rise to this lawsuit.

Notice:

The exhibit titled "Jurisdictional Clarification and Renewed Offer of Settlement" is included on the following page. Please scroll down to review.

Briefly describe the result below and the main issues on appeal.

Describe any proceedings remaining below or any related proceedings in other tribunals.

Signature s/Lianlian Porth, Pro se
(use "s/[typed name]" to sign electronically-filed documents)

Date 08/07/2025

Feedback or questions about this form? Email us at

Jurisdictional Clarification and Renewed Offer of Settlement

Plaintiff respectfully objects to the trial court's determination that subject matter jurisdiction under federal law is lacking. The court concluded that both parties are California residents. However, according to publicly available information disclosed by Defendants, the corporate parent of Defendants (which also serves as their global headquarters) announced in June 2025 that it had relocated to the State of Wyoming. This change satisfies the criteria for complete diversity under 28 U.S.C. § 1332.

In light of this, Plaintiff has filed a Notice of Appeal in accordance with federal law. At the same time, Plaintiff reiterates the underlying cause of this action: Defendants' failure to timely comply with the court's order regarding the transfer of inheritance rights, which has caused Plaintiff financial harm.

Nonetheless, Plaintiff has consistently maintained that a protracted legal dispute is in the interest of no party. Plaintiff continues to uphold the foundational principle set forth in Rule 1 of the Federal Rules of Civil Procedure—that disputes should be resolved in a just, efficient, and cost-effective manner. Plaintiff maintains that, once the essence of the matter has been clearly recognized, both parties must possess and demonstrate the restraint and decisive capacity necessary to bring this dispute to an end.

Consistent with the settlement proposal originally proposed at the outset of litigation, Plaintiff now extends to Defendants a renewed opportunity to resolve this matter peacefully at the start of the appellate phase. This renewed invitation is guided by the same principled commitment to ending this dispute in a manner that is more mature, more measured, and more constructive—both for the parties and for the integrity of the broader market.

Plaintiff sincerely invites Defendants to respond with due deliberation to the proposal, in light of the industry's long-term development and the stability of the broader market. At the same time, Plaintiff affirms that, should Defendants choose to persist in opposition, Plaintiff is fully prepared to advance the case through to final adjudication.